

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THIS DOCUMENT RELATES TO:

1199SEIU NATIONAL BENEFIT FUND *et al.*,  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,

vs.

SANDOZ INC., *et al.*,

Defendants.

**Civil Action No. 2:24-cv-04894**

**HON. CYNTHIA M. RUFE**

**JOINT STIPULATION REGARDING  
DEFENDANTS' DEADLINE TO RESPOND TO THE COMPLAINT**

WHEREAS, Defendants Sandoz Inc., Sandoz Group AG, Sandoz AG, and Novartis AG's (collectively, "Defendants") deadline to respond to Plaintiffs' Complaint is currently January 6, 2025. *See* ECF No. 6.

WHEREAS, on December 16, 2024, Plaintiffs and Sandoz Inc. reached a settlement agreement resolving all claims the Plaintiffs bring in this action and related claims in *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, MDL No. 16-md-2724 (E.D. Pa.) ("the *Generics MDL*"), subject to Court approval;<sup>1</sup>

WHEREAS, under the settlement agreement, in connection with their motion for preliminary approval of the settlement,<sup>2</sup> Plaintiffs will ask the Court to stay this action and thereafter will ask the Court to dismiss it entirely upon final approval of the settlement;

WHEREAS, Plaintiffs expect to present the settlement agreement in the *Generics MDL* for preliminary approval on or before February 14, 2025, which is after the current deadline for

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<sup>1</sup> The settlement agreement's release covers all Defendants in this proceeding.

<sup>2</sup> Specific to this action, Plaintiffs will seek a limited exception of the stay that would permit Plaintiffs to file a proof of service as to Defendant Sandoz Group AG in this proceeding.

Defendants' deadline to respond to the Complaint in this action;

WHEREAS, in the interest of conserving the resources of the parties and this Court and in view of the parties' resolution of this action, the parties have stipulated to a stay of Defendants' deadline to respond to the Complaint;

It is hereby **STIPULATED AND AGREED** by and among the undersigned counsel, on behalf of their respective clients, as follows:

1. Defendants' deadline to respond to Plaintiffs' Complaint is **STAYED**.

**IT IS SO STIPULATED**

Dated: December 23, 2024

Respectfully submitted:

/s/ Roberta D. Liebenberg

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